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Magistrate Judge Brian A. Tsuchida

AUG 08 2023

AT SEATTLE
CLERK U.S. DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
BY DEPUTY

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

v.

Edgar Alejandro ZATARAIN RODRIGUEZ,
Iker Daniel CASTILLO SARABIA, and
Mateo De Jesus GONZALEZ GARCIA,
Defendants.

CASE NO. MJ23-402

COMPLAINT for VIOLATION

Title 21, United States Code, Sections
841(a)(1) and 841(b)(1)(B) and Title 18
United States Code, Section 2

BEFORE, Brian A. Tsuchida, United States Magistrate Judge, U. S. Courthouse,
Seattle, Washington.

The undersigned complainant being duly sworn states:

COUNT ONE

(Possession of Controlled Substances with Intent to Distribute)

On or about August 8, 2023, in King County, within the Western District of
Washington, and elsewhere, defendants Edgar Alejandro ZATARAIN RODRIGUEZ,
Iker Daniel CASTILLO SARABIA, and Mateo De Jesus GONZALEZ GARCIA, did
knowingly and intentionally possess with intent to distribute, and aid and abet the

1 possession of with intent to distribute, controlled substances including: N-phenyl-N-[1-
2 (2-phenylethyl)-4-piperidinyl] propanamide (Fentanyl) and cocaine, substances
3 controlled under Title 21, United States Code.

4 It is further alleged that the offense involved 40 grams or more of a mixture or
5 substance containing a detectable amount of Fentanyl, in violation of Title 21, United
6 States Code, Sections 841(b)(1)(B).

7 All in violation of Title 21, United States Code, Sections 841(a)(1) and 841 and
8 Title 18 United States Code Section 2.

9
10 And the complainant states that this Complaint is based on the following
11 information:

12 I, Eric C. Rodenberg, being first duly sworn on oath, depose and say:

13 **AGENT BACKGROUND AND INTRODUCTION**

14 1. I am an “investigative or law enforcement officer of the United States”
15 within the meaning of Title 18, United States Code, Section 2510(7), that is, an officer of
16 the United States who is empowered by law to conduct investigations of, and to make
17 arrests for, offenses enumerated in Title 18, United States Code, Section 2516. I am a
18 Special Agent of the United States Department of Justice, Drug Enforcement
19 Administration (DEA), and have been so employed since August 2019. I am currently
20 assigned to the DEA Seattle Field Division, Tacoma Resident Office.

21 2. I received 16 weeks of specialized drug law enforcement training at the
22 DEA training academy in Quantico, Virginia, from August 2019 to December 2019. The
23 training curriculum covered all aspects of drug investigations, including identification of
24 controlled substances, physical and electronic surveillance, utilization of confidential
25 sources, interview techniques, undercover operations, financial investigations, and the
26 general operation of drug trafficking organizations.

1 3. As a Special Agent, I have been involved in the investigation of individuals
2 and organizations involved in the manufacture, transportation and distribution of
3 controlled substances. I have participated in the execution of search warrants for
4 violations of federal and state drug laws. I have conducted surveillance operations and
5 have become familiar with the methods used by individuals engaged in the manufacture,
6 transportation and distribution of controlled substances. I have also consulted with other
7 Special Agents that have monitored informant conversations with drug traffickers, and
8 have monitored drug-related conversations between drug traffickers as part of court-
9 authorized interception of wire communications. In light of the foregoing, I am familiar
10 with the manner in which illegal drugs are manufactured, transported, stored, and
11 distributed; the methods of payment for such drugs; and the methods of laundering drug
12 proceeds.

13 4. Prior to working for the DEA, I was employed with the Kent Police
14 Department in Kent, WA. I was assigned to the patrol division from June 2018 to August
15 2019. While working at the Kent Police Department, I came in contact with individuals
16 using and selling drugs on a daily basis. As such, I became familiar with the different
17 tactics used to conceal drugs as well as the different methods used to transport and speak
18 about drugs. This includes the use of coded language when speaking about drugs, which
19 is a common way for drug dealers and users to communicate.

20 5. Prior to working with the Kent Police Department, I was employed with the
21 Missouri State Highway Patrol (MSHP) from July 2013 to May 2018. While working
22 with the MSHP, I received over 1400 hours of specialized law enforcement training at the
23 MSHP training academy. The curriculum covered subjects such as investigative skills,
24 interview and interrogation techniques, enforcement of various laws, building searches,
25 firearms marksmanship, and physical training. Following the academy, I enrolled in the
26 Drug Recognition Expert (DRE) program, and was trained to identify drugs and the
27 physical symptoms associated with their use.

1 6. The facts set forth in this affidavit arise from my personal and direct
2 participation in the investigation, my experience and training as a DEA Special Agent,
3 my conversations with witnesses and other law enforcement personnel, including
4 consultations with other agents participating in this and related investigations, and my
5 review of relevant documents and reports. I have not included every fact known to me or
6 other investigative personnel concerning this investigation. My specialized training and
7 experience in drug investigations as well as the assistance and input of experienced
8 fellow investigators, form a basis for my opinions and conclusions, which I drew from
9 the facts set forth herein.

10 7. As set forth below, there is probable cause to believe that defendants Edgar
11 Alejandro ZATARAIN RODRIGUEZ, Iker Daniel CASTILLO SARABIA, and Mateo
12 De Jesus GONZALEZ GARCIA committed the counts alleged above. Since this affidavit
13 is being submitted for the limited purpose of establishing probable cause, I have not
14 included every fact known concerning this investigation. I have set forth only the facts I
15 believe are essential for a fair determination of probable cause.

16 SUMMARY OF PROBABLE CAUSE

17 8. On August 8, 2023, members of the Drug Enforcement Administration
18 Seattle Field Division and Tacoma Resident Offices executed a search warrant at the
19 garage located at 2414 S 144th St, Seatac, WA. The garage had been converted into a
20 residential unit. The garage door had been replaced by a wall and there was a kitchen and
21 two bedrooms and a bathroom inside the garage. Inside the garage agents found three
22 occupants. One was near the main door of the structure, later identified as Iker Daniel
23 CASTILLO SARABIA. The other two were inside the first bedroom to the left, which
24 had two blow-up mattresses inside they were sleeping on. They were later identified as
25 Edgar Alejandro ZATARAIN RODRIGUEZ and Mateo De Jesus GONZALEZ
26 GARCIA.
27

1 9. During the search of the structure, agents found the following suspected
2 narcotics which were located in multiple duffel bags in the living/kitchen area and the
3 second bedroom. The second bedroom was not occupied by anyone. Agents found
4 approximately 8,980 gross grams of blue pills marked M-30 and suspected to be
5 fentanyl¹, approximately 556 gross grams of a brown tar substance suspected to be
6 heroin, approximately 6,265 gross grams of a white powder which agents suspect to be
7 fentanyl powder, and approximately 189 gross grams of a white powder which agents
8 suspect to be cocaine. The suspected cocaine was later field tested with a presumptive
9 positive result for cocaine.

10 10. Lakewood PD Detective Jason Catlett and myself spoke with the three
11 occupants found in the structure. Detective Catlett is fluent in Spanish. All three
12 occupants were read their Miranda warnings separately and all three agreed to speak to
13 law enforcement officers. The first individual spoken to was GONZALEZ GARCIA.
14 GONZALEZ GARCIA admitted that he was selling illegal drugs in the Western
15 Washington area. When asked how he typically sold the drugs, GONZALEZ GARCIA
16 said he would receive information from someone over the phone, whom he only knew as
17 "Manny." This person would tell him where to go when a drug deal was set up.
18 GONZALEZ GARCIA said that he would receive more drugs every couple days. Shortly
19 thereafter, GONZALEZ GARCIA said that he was still willing to talk, but that he wanted
20 to hear what kind of deal could be offered to him. At this point, the conversation was
21 ended.

22 11. The second individual spoken to was ZATARAIN RODRIGUEZ.
23 ZATARAIN RODRIGUEZ admitted that he had been up in the Western Washington area
24 selling drugs for a couple of months. ZATARAIN RODRIGUEZ said that he was
25 originally spoken to by someone who identified himself as "Bogatine" down in Mazatlan.
26 Once in Western Washington, ZATARAIN RODRIGUEZ also said he was contacted by

27 ¹ Although these pills were not field tested by agents, they appeared to be similar to the blue M-30 pills purchased
and/or seized on many occasions by agents. They type of pills have tested positive for the presence of fentanyl.
Based on my training and experience, I believe these pills contain fentanyl.

1 an individual who identified himself as "Manny." ZATARAIN RODRIGUEZ said he
2 would be called by Manny every day and Manny would tell him how much (drugs) to
3 prepare for the day, as well as how much money to collect. ZATARAIN RODRIGUEZ
4 said that GONZALEZ GARCIA would be contacted every couple of days by someone
5 known as "HERNANDEZ" driving a silver sedan. HERNANDEZ would re-supply them
6 with drugs during each visit. ZATARAIN RODRIGUEZ said he never had contact with
7 HERNANDEZ himself, that it was always GONZALEZ GARCIA.

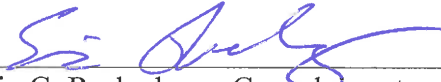
8 12. The third individual spoken to was CASTILLO SARABIA. CASTILLO
9 SARABIA was initially not forthcoming with information, but soon admitted that he was
10 in Western Washington to sell illegal narcotics. CASTILLO SARABIA said that he has
11 been in the area for a couple weeks and is staying in different motels/hotels in the area.
12 CASTILLO SARABIA said that he gets switched to different motels/hotels every few
13 days. CASTILLO SARABIA said that he typically sells to "white" customers in the area.
14 He said that every day he will meet someone who gives him a case (as he described it)
15 with drugs inside to sell that day. CASTILLO SARABIA said that every day he is told to
16 erase the phone numbers that contacted him during that day. CASTILLO SARABIA said
17 that he was currently not in a hotel and was here washing his clothes. He said he expected
18 to be here another night and then would be put back in a motel/hotel.

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1 13. Based on the above facts, I respectfully submit that there is probable cause
2 to believe that Edgar Alejandro ZATARAIN RODRIGUEZ, Iker Daniel CASTILLO
3 SARABIA, and Mateo De Jesus GONZALEZ GARCIA did knowingly and intentionally
4 possess with intent to distribute controlled substances, including fentanyl, cocaine, and
5 heroin in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

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7 
8 Eric C. Rodenberg, Complainant
9 Special Agent, DEA

10 Based on the Complaint and Affidavit sworn to before me, and subscribed in my
11 presence, the Court hereby finds that there is probable cause to believe the Defendant
12 committed the offense set forth in the Complaint.

13 Dated this 8th day of August, 2023.

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15 
16 BRIAN A. TSUCHIDA
17 United States Magistrate Judge
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